

EXHIBIT 11

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 In re:

5 PG&E CORPORATION

6 - and -

7 PACIFIC GAS AND ELECTRIC
8 COMPANY,

9 Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF ALICIA O'NEILL
REGARDING WILLIAM B. ABRAMS
MOTION TO DESIGNATE
IMPROPERLY SOLICITED VOTES
PURSUANT TO 11 U.S.C. §1125(B) AND
1126(E) AND BANKRUPTCY RULE 2019**

- 10 ☐ Affects PG&E Corporation
11 ☐ Affects Pacific Gas and Electric Company
12 ☒ Affects both Debtors

13 ** All papers shall be filed in the Lead Case,
14 No. 19-30088 (DM).*

Date: May 12, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Docket No. 6799, 6964, 6963

15 **DECLARATION OF ALICIA O'NEILL**

16 Alicia O'Neill declares the following pursuant to 28 U.S.C. § 1746:

17 1. I am the attorney who heads the Mass Torts Department of WATTS GUERRA, with
18 primary responsibility over all litigation communications with its California Fires client base.

19 2. I manage over seventy (70) WATTS GUERRA Mass Tort employees, and direct
20 their daily activities.

21 3. I affirm that the only individuals contacted by WATTS GUERRA employees
22 concerning the vote in the California Fires case are those for whom we have been employed via a
23 written client retention agreement whereby an individual client hires WATTS GUERRA as their
24 lawyers.

25 4. Furthermore, I affirm that my WATTS GUERRA Mass Tort Department employees
26 have placed no call to our client base where we are badgering them, or directing their vote. While
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1 we have, pursuant to our firm's contractual obligations under the December 6, 2019 Restructuring
2 Support Agreement, advocated that our clients should vote to "ACCEPT" the proposed
3 approximate \$13.5 billion settlement with PG&E, we also have made clear that the vote of each
4 individual is their vote to make, and that we will continue to act as their counsel, regardless of how
5 they choose to vote.
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7 5. In addition, our written disclosure of the credit facility issue has been translated into
8 Spanish and provided in writing to our 169 clients who have asked to communicate in Spanish.

9 I declare under penalty of perjury that the foregoing is true and correct.

10 Executed on this the 8th day of May, 2020.

11 /s/ Alicia O'Neill
12 Alicia O'Neill
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